

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

<b>MICHAEL POSTAWKO, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 2:16-CV-04219-NKL</b>
	)	
<b>MISSOURI DEPARTMENT OF</b>	)	
<b>CORRECTIONS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION TO STAY AMENDED SCHEDULING ORDER  
AND SUGGESTIONS IN SUPPORT THEREOF**

The Parties hereby move this Court for entry of an Order staying this action and the Amended Scheduling and Jury Trial Order (doc. 254; see also docs. 364, 399, 408, 431, and 433 collectively, the “Scheduling Order”). As grounds for and in support of this Motion, the Parties state as follows:

1. On February 12, 2020, the Parties continued their efforts to resolve this dispute through mediation. The Parties made significant progress and agreed to extend the deadline for the State to serve its experts reports an additional two (2) weeks.

2. Since that time, the Parties have made further strides in negotiating a settlement and believe they are on a path to resolve this action. They want to concentrate their efforts and avoid waste of resources associated with discovery-related and pretrial-related activities while they bring this action to a final resolution.

Therefore, the Parties respectfully request a stay of all existing deadlines in the Scheduling Order. If the Parties are not successful in resolving this dispute within the next sixty (60) days, then they will request the Court reset the existing deadlines in the Scheduling Order.

3. Contemporaneously with the filing of this Motion, the Parties will submit a proposed Order to the Court in compliance with the Scheduling Order.

WHEREFORE, premises considered, the Parties respectfully request that the Court enter an Order staying this action and the Scheduling Order consistent with the proposed Order submitted contemporaneously herewith.

Dated: April 3, 2020.

/s/ Amy Breihan

*One of the Attorneys for Plaintiffs*

Anthony E. Rothert  
Jessie Steffan  
Omri E. Praiss  
**AMERICAN CIVIL LIBERTIES UNION OF MISSOURI FOUNDATION**  
906 Olive Street  
Suite 1130  
St. Louis, Missouri 63108  
Telephone: (314) 652-3114  
Facsimile: (314) 652-3112  
trothert@aclu-mo.org  
gwilcox@aclu-mo.org  
jsteffan@aclu-mo.org  
opraiss@aclu-mo.org

Gillian R. Wilcox  
**AMERICAN CIVIL LIBERTIES UNION OF MISSOURI FOUNDATION**  
406 West 34th Street, Suite 420

Kansas, Missouri 64111  
gwilcox@aclu-mo.org

Megan G. Crane  
Amy E. Breihan  
**RODERICK & SOLANGE MACARTHUR JUSTICE CENTER**  
3115 South Grand Blvd., Suite 300  
St. Louis, Missouri 63118  
Telephone: (314) 254-8540  
megan.crane@macarthurjustice.org  
amy.breihan@macarthurjustice.org

Amelia Igo Pelly Frenkel (*pro hac vice*)  
Anastasia McLetchie Pastan (*pro hac vice*)  
Elizabeth Lynn Henthorne (*pro hac vice*)  
Kieran Gostin (*pro hac vice*)  
Tamarra Matthews Johnson (*pro hac vice*)  
**WILKINSON WALSH LLP**  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Telephone: (202) 847-4000  
afrenkel@wilkinsonwalsh.com  
apastan@wilkinsonwalsh.com  
bhenthorne@wilkinsonwalsh.com  
kgostin@wilkinsonwalsh.com  
tmatthewsjohnson@wilkinsonwalsh.com

Meghan C. Cleary (*pro hac vice*)  
**WILKINSON WALSH LLP**  
130 West 42nd Street, Suite 1402  
New York, NY 10036  
Telephone: (424) 291-9669  
Facsimile: (202) 847-4005  
mcleary@wilkinsonwalsh.com

*/s/ William R. Lunsford*  
\_\_\_\_\_  
*One of the Attorneys for Defendant  
Corizon, LLC*

William R. Lunsford

Matthew B. Reeves  
**MAYNARD, COOPER & GALE, P.C.**  
655 Gallatin Street  
Huntsville, Alabama 35801  
Telephone: (256) 551-0171  
Facsimile: (256) 512-0119  
blunsford@maynardcooper.com  
mreeves@maynardcooper.com

Dwight A. Vermette  
**ECKENRODE-MAUPIN**  
11477 Olde Cabin Road  
Suite 110  
St. Louis, Missouri 63141  
Telephone: (314) 726-6670  
Facsimile: (314) 726-2106  
dav@eckenrode-law.com

/s/ Jennifer Baumann

*One of the Attorneys for Defendants  
Missouri Department of Corrections,  
Adrienne Hardy, and Anne L.  
Precythe*

Zachary T. Buchheit  
**OFFICE OF THE ATTORNEY GENERAL**  
P.O. Box 899  
Jefferson City, Missouri 65102  
Telephone: (573) 751-8807  
Facsimile: (573) 751-0774  
zachary.buchheit@ago.mo.gov

John W. Taylor  
Jennifer Baumann  
**OFFICE OF THE ATTORNEY GENERAL**  
815 Olive Street  
St. Louis, Missouri 63101  
Telephone: (314) 340-7861  
Facsimile: (314) 340-7029  
john.taylor@ago.mo.gov

jennifer.baumann@ago.mo.gov